



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 7
25 FUNSTON ROAD
KANSAS CITY, KANSAS 66115

Morby

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~~*[Signature]*~~
Alfretta

NOV 13 1984

MEMORANDUM

SUBJECT: Transmittal of Inspection Report.

FROM: Robert B. Dona *RB Dona*
Chief, Field Investigations Section, EMCM/ENSV

TO: Michael J. Sanderson
Chief, AWCM/ARWM

This memorandum transmits the following RCRA compliance inspection as performed by the Field Investigations Section, Environmental Monitoring and Compliance Branch, Environmental Services Division.

<u>Facility</u>	<u>EPA ID Number</u>	<u>Activity Number</u>	<u>Areas of Non-Compliance</u>
PCB, Incorporated of Missouri Kansas City, MO	MOD 980633044	ALF77	None

Attachment

RECEIVED
NOV 13 1984
AIR AND WASTE COMPLIANCE
BRANCH



R00010325
RCRA Records Center

REPORT OF RCRA COMPLIANCE INSPECTION

AT

PCB, INCORPORATED OF MISSOURI
2108 WYANDOTTE
KANSAS CITY, MISSOURI 64108

TELEPHONE NUMBER: (816) 221-3660

EPA ID NUMBER: MOD 980633044

BY

U.S. ENVIRONMENTAL PROTECTION AGENCY
Region VII
Environmental Services Division

INTRODUCTION

At the request of the Air and Waste Management Division, a RCRA compliance evaluation inspection was performed at PCB, Inc. of Missouri in Kansas City, Missouri, on November 5, 1984. The inspection was conducted under the authority of Section 3007 of the Resource Conservation and Recovery Act (RCRA), as amended. This narrative report and attachments present the results of the inspection.

PARTICIPANTS

PCB, Inc. of Missouri:
Bob Van Horn, General Manager
Jack Van Gundy, President

Missouri Department of Natural Resources (MDNR):
John Schofield, Environmental Specialist

U.S. Environmental Protection Agency (EPA):
Jo Lynne Moore, Environmental Scientist, Inspector

Accompanied by Mr. John Schofield, I attempted to contact Mr. Jack Van Gundy at the facility. Mr. Van Gundy was in a meeting, therefore, we were received by Mr. Bob Van Horn. Mr. Schofield and I introduced ourselves, presented our credentials, and I outlined the purpose and procedure of the inspection. Mr. Van Horn provided information concerning operations at PCB, Inc. and their contract companies, and provided a tour of the storage areas. Discussions concerning PCB treatment were limited to process wastes and general information as not to disclose confidential business information claimed under TSCA (Toxic Substance and Control Act). At the debriefing session, I provided Mr. Van Horn with a RCRA Inspection Confidentiality Notice which he acknowledged by signing. No confidential information was viewed or discussed during the inspection.

FACILITY DESCRIPTION

PCB, Inc. of Missouri disassembles capacitors and destroys PCBs. There are three primary functions at PCB, Inc.: the capacitor process line, the transformer process line, and the PCB cleaning line. Capacitors, transformers, drums of PCB contaminated waste, drums or tank trucks of PCBs arrive at the facility for disassembling, sorting and transport for final destruction. Highly contaminated oil and packing is sent for incineration at SCA Chemical Services, Inc. in Chicago, Illinois. Cleaned parts are drummed for landfilling at U.S. Ecology in Beatty, Nevada.

CB Oil Company, a contract company of PCB, Inc. hires personnel to operate the capacitor processing line. In this process, capacitors are cut in half, the insides removed, shredded and packed in 55-gallon steel drums for incineration at SCA. The metal halves are degreased until the PCB concentration is less than 0.2 mg/100 sq. cm. Bushings and ears are drummed and landfilled at U.S. Ecology. The degreasing agent is handled as PCB waste.

Transformer oil that is high in concentration of PCB's is drummed and transported to SCA for incineration. Low parts oil (less than 2,000 ppm PCB's) is cleaned. Metal parts are cleaned, drummed and transported to U.S. Ecology to be landfilled.

PCB, Inc. receives drums of PCB waste material that are opened, sorted, redrummed and disposed of accordingly.

Bulk oil, low in PCB concentration is processed (cleaned). The reactor is operated in batches. The volume of a typical batch is one-twelfth the maximum capacity of the system. The end materials from the treatment process are the clean oil and a semi-solid material. The oil is either sold or reused at the facility. The solids are drummed, transported and incinerated at SCA.

PCB, Inc. occupies several floors of a warehouse building. Their operations are segregated by processes on each floor. PCB maintains an extensive tracking system to ensure a 90-day turnaround. The document system includes such records as manifests document numbers, serial numbers, color and numerically marked drums, dates: of collection, processing, transporting and final destruction.

Sample analysis are performed by CFP Laboratories, who are located in the same building.

FINDINGS AND OBSERVATIONS

PCB, Incorporated of Missouri originally notified EPA of its hazardous waste activity on February 17, 1982 as a transporter and a treatment/storage/disposal facility. EPA removed the TSDF status on June 21, 1982.

1. PCB, Inc. owns two tractors with trailers which are used to transport PCB material to their facility or to a permitted disposal facility. Most

PCB material arrives at the facility via common carrier. The majority of the waste is containerized in small quantities (drums, crates, etc.), but occasionally a tank truck load of PCBs will arrive for processing.

According to Mr. Van Horn, the facility has transported PCB material, but never hazardous waste regulated by RCRA.

The two tractors are serviced off site, therefore, PCB, Inc. does not generate waste oil from maintenance.

2. All transformers, capacitors and drums noted during the inspection were labeled with hazardous waste labels (ORM-E RQ) and PCB warning labels. All materials in storage were segregated by waste classification (i.e. Type A debris for landfilling such as gloves, floor dry, etc.), and relabeled with the PCB manifest number for disposal.

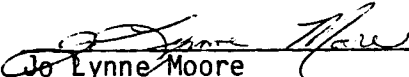
3. The reactor for PCB processing was disassembled two or three months ago according to Mr. Van Horn. This process was moved to ERMI (Environmental Resources Management, Inc. of Missouri), at 45 Ewing Street, reassembled and modified by adding additional components. Mr. Van Horn stated that the TSCA approval for the oil process and the capacitor processing line were recently transferred to ERMI.

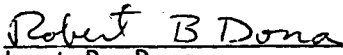
The treatment process and the degreasing operation generated waste regulated under TSCA.

4. The manifest document system, vehicles, etc. were inspected by the Department of Transportation (DOT), the week prior to the compliance evaluation inspection.

CONCLUSIONS

According to the information given by Mr. Van Horn, PCB, Inc. of Missouri, does not generate hazardous waste regulated by RCRA, nor have they transported hazardous waste as defined by RCRA.


Jo Lynne Moore
Environmental Scientist
Date: 11/9/84
Activity Number: ALF77


Robert B. Dona
Chief, Field Investigations Section
Date: Nov 9, 1984

Attachments:

1. RCRA Inspection Confidentiality Notice (3 pages)

U.S. ENVIRONMENTAL PROTECTION AGENCY
RCRA INSPECTION
CONFIDENTIALITY NOTICE

Name and Address of Inspector(s) <i>Johnnie Moore</i> U.S. EPA, Region VII ENSV Division 25 Funston Road Kansas City, Kansas 66115	Name and Address of Facility <i>PCB Inc 7 Mo</i> <i>2108 Wyandotte</i> Owner, Operator, or Agent in Charge Title Address	
Name of Individual to Whom Notice Given <i>E. b. Van Hara</i>	Title <i>General Mgr</i>	Date <i>M 11/5/84</i>

It is possible that EPA will receive public requests for release of the information obtained during inspection of the facility above. Such requests will be handled by EPA in accordance with provisions of the Freedom of Information Act (FOIA), 5 U.S.C. 552; EPA regulations issued thereunder, 40 CFR Part 2; and the Resource Conservation and Recovery Act, Section 3007. EPA is required to make inspection data available in response to FOIA requests, unless the Administrator of the Agency determines that the data contains information entitled to confidential treatment.

Any or all of the information collected by EPA during the inspection may be claimed confidential, if it relates to trade secrets or commercial or financial matters that you consider to be confidential. If you make claims of confidentiality, EPA will disclose the information only to the extent, and by the means of the procedures set forth in the regulations (cited above) governing EPA's treatment of confidential information. Among other things, the regulations require that the EPA notify you in advance of publicly disclosing any information you have claimed and certified confidential.

To claim information confidential, you must certify that each claimed item meets all of the following criteria:

1. Your company has taken measures to protect the confidentiality of the information, and it intends to continue to take such measures.
2. The information is not, and has not been, reasonably obtainable without your company's consent by other persons (other than governmental bodies) by use of legitimate means (other than discovery based on a showing of special need in a judicial or quasi-judicial proceeding).
3. The information is not publicly available elsewhere.
4. Disclosure of the information would cause substantial harm to your company's competitive position.

At the completion of the inspection, you will be given a receipt for all documents, samples, and other materials collected. At that time you may make claims that some or all of the information is confidential and meets the four criteria listed above.

RCRA INSPECTION CONFIDENTIALITY NOTICE

Facility

PCB Inc. of Mo

If you are not authorized by your company to make confidentiality claims, this notice will be sent by certified mail, along with the receipt for documents, samples, and other materials, to the Owner, Operator, or Agent in Charge of your firm, within two days of this date. That person must return a statement, specifying any information which should receive confidential treatment.

This statement from the Owner, Operator, or Agent in Charge should be addressed to:

Mr. David A. Wagoner
Director, Air and Waste Management Division
United States Environmental Protection Agency
324 E. 11th Street
Kansas City, Missouri 64106

and mailed by registered, return-receipt requested mail with in seven (7) calendar days of receipt of this Notice.

Failure by your firm to submit a written request that information be treated as confidential, either at the completion of the inspection or by the Owner, Operator, or Agent in charge, within the seven-day period, will be treated by the EPA as a waiver by your company of any claims for confidentiality regarding the inspection data.

To be completed by the facility official receiving this Notice:

I have received and read this Notice.

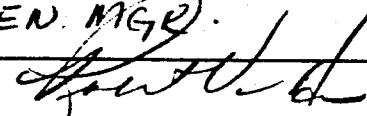
Name

Robert Van Horn

Title

GEN. MGR.

Signature



Date

11-5-84

If there is no one on the premises of the facility who is authorized to make business confidentiality claims for the firm, a copy of this Notice and other inspection materials will be sent to the Owner, Operator, or Agent in charge of the company. If there is another company official who should also receive this information, please designate below:

Name

Title

Address

U.S. ENVIRONMENTAL PROTECTION AGENCY
324 EAST 11TH STREET
KANSAS CITY, MISSOURI 65106

REQUEST FOR CONFIDENTIAL
TREATMENT

Name of Individual <i>Bob Von Horn</i>	Title <i>Gen. Mgr.</i>	Date <i>11/5/84</i>
Firm Name <i>PCB Inc. of Mo.</i>	Firm Address <i>2108 Wyandotte</i>	

Information for which Confidential Treatment is requested:

NONE

Acknowledgement of Claimant

The undersigned requests that confidential treatment of the information described be provided in accordance with provisions of the Freedom of Information Act (FOIA), 5U.S.C.552; EPA regulations issued thereunder, 40 CFR Part 2; and the Resource Conservation and Recovery Act (RCRA), Section 3007. The undersigned further acknowledges that he/she is authorized to make such claims for his/her firm.

The undersigned also certifies that each item described above meets all of the following criteria: (1) The company has taken measures to protect the confidentiality of the information, and it intends to continue to take such measures; (2) The information is not, and has not been, reasonably attainable without the company's consent by other persons (other than governmental bodies) by use of legitimate means (other than discovery based on a showing of special need in a judicial or quasi-judicial proceeding; (3) The information is not publicly available elsewhere; and (4) Disclosure of the information would cause substantial harm to the company's competitive position.

Signature (Owner, Operator, or Agent) <i>[Signature]</i>	Title <i>Gen. Mgr.</i>
Name of Inspector <i>John Moore</i>	Inspector's Signature <i>[Signature]</i>
Title <i>Env. Sci.</i>	